

**BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS**

In the Matter of a General Investigation for )  
Momentum Telecom, Inc. to Show Cause )  
Why this Commission Should Not Initiate )  
Penalties, Sanctions, and/or Fines for ) Docket No. 21-MOMT-376-SHO  
Non-Compliance with Kansas Statutes )  
And Commission Orders. )

**JOINT MOTION FOR EXTENSION OF TIME FOR  
MOMENTUM TELECOM, INC. TO RESPOND TO ORDER TO SHOW CAUSE**

Come now the undersigned counsel for the Parties in this matter and respectfully request that the Commission grant Momentum Telecom, Inc. (“Momentum”) an extension of forty-five (45) days to respond to the Order to Show Cause (“Order”), showing the Commission as follows: The Order was filed on April 6, 2021, alleging that Momentum had failed to pay certain Kansas Universal Service Fund (KUSF) assessments.

1. The Order was served upon Momentum on April 8, 2021. Momentum’s response to the Order was otherwise due on May 10, 2021.

2. Upon receipt of the Order, Momentum diligently commenced an investigation to determine its compliance with Kansas Statutes and Commission Orders.

3. On May 6, 2021, Momentum tendered via Federal Express payment of all sums due under the Order to GVNW Consulting, Inc. (GVNW), the KUSF Administrator.

4. Further, it is Momentum’s intention to file all necessary reports to come into compliance with the Order. Momentum has diligently undertaken that effort, but requests an additional forty-five (45) day period to complete the submission of such reports to the Commission, such that Momentum’s response would be due June 24, 2021.

5. The undersigned counsel for Momentum has communicated with the undersigned

counsel for the Commission, who has consented to this request for an extension for the purposes stated.

6. This request is made in good faith and solely for purpose of administrative efficiency, and not for delay or any other improper purpose.

Wherefore, the Parties request that the Commission grant the requested extension, extending the time in which Momentum may respond to the Order through and including June 24, 2021.

*/s/ Walker Hendrix*

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*/s/ Joseph Coomes*

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Counsel for Momentum Telecom, Inc.

STATE OF KANSAS            )  
  ) ss.  
COUNTY OF SHAWNEE    )

**VERIFICATION**

Walker Hendrix, being duly sworn upon his oath deposes and states that he is a Litigation Counsel for Litigation Counsel of the Kansas Corporation Commission of the State of Kansas, that he has read and is familiar with the foregoing Joint *Motion for Extension* and attests that the statements contained therein are true and correct to the best of his knowledge, information and belief.

*/s/ Walker Hendrix*

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Walker Hendrix, 08835  
Litigation Counsel  
Kansas Corporation Commission

Subscribed and sworn to before me this 10 day of May, 2021.

*Ann M. Murphy*



## CERTIFICATE OF SERVICE

21-MOMT-376-SHO

I, the undersigned, certify that a true and correct copy of the above and foregoing Joint Motion For Extension Of Time For Momentum Telcom, Inc. To Response To Order To Show Cause was served via the United States Mail and electronic service this 10th day of May, 2021, to the following:

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